

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Angelina Geiger		
	Debtors	
Toyota Motor Credit Corporation		BK NO. 20-13311-mdc
	Movant	
v.		CHAPTER 13
Angelina Geiger		
	Respondent	

**OBJECTION OF TOYOTA MOTOR CREDIT CORPORATION TO CONFIRMATION  
OF DEBTOR'S CHAPTER 13 PLAN**

Toyota Motor Credit Corporation ("Movant"), by its Attorney, Leopold & Associates, PLLC, objects to the confirmation of the Debtor's Chapter 13 Plan as follows:

1. On January 6, 2020, the Debtor entered into an Agreement which was secured by a 2011 Audi Q5 with VIN #WA1DKAFP6BA024428.
2. On September 1, 2020, Movant filed a secured proof of claim setting forth a total secured debt of \$16,058.60 with an interest rate of 11%.
3. The Debtor's Plan fails to provide for any treatment of the Movant's secured claim.
4. The Movant's claim cannot be modified under the plan as the debt was originated less than 910 days prior to the filing of this bankruptcy and cannot be modified pursuant to 11 U.S.C. §1325(a) hanging paragraph.
5. The Debtor's Plan does not propose any payments to Movant which does not satisfy the claimed secured amount due to Movant in the amount of \$16,058.60.
6. Accordingly, Movant objects to Debtor's plan as it is not feasible in that it does not fully compensate the Movant's secured claim.
7. In addition, the plan fails to comply with the requirements of 11 U.S.C. §1322 and §1325.

WHEREFORE, the Movant pray that the Court denies the confirmation of the Debtor's plan and grant any other such further relief at law or in equity as is just.

Date: September 8, 2020

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**CERTIFICATE OF SERVICE**

I, Robert Wendt, attorney for Movant, do hereby certify that true and correct copies of the foregoing Objection to Confirmation of Debtor's Chapter 13 Plan have been served on September 8, 2020, by first class mail, and/or electronic means upon those listed below:

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Date: September 8, 2020

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